

000010223

CORRESP. CONTROL
INCOMING LTR NO.

SEP 26 1990

1248 RF 90 | States Government

Department of Energy

DUE
DATE

memorandum

Rocky Flats Office

ACTION

LIST.	
HOFF, F.H.	<input checked="" type="checkbox"/>
ANCH, D.B.	<input checked="" type="checkbox"/>
REEN, J.H.	<input checked="" type="checkbox"/>
NETZKE, J.C.	<input checked="" type="checkbox"/>
IRLINGAME, A.H.	<input checked="" type="checkbox"/>
OUCHER, D.W.	<input checked="" type="checkbox"/>
IVIS, J.G.	<input checked="" type="checkbox"/>
ERED, J.E.	<input checked="" type="checkbox"/>
RRERA, D.W.	<input checked="" type="checkbox"/>
RRIS, L.R.	<input checked="" type="checkbox"/>
ANCIS, G.E.	<input checked="" type="checkbox"/>
DOOWIN, R.	<input checked="" type="checkbox"/>
EALY, T.J.	<input checked="" type="checkbox"/>
NS, J.P.	<input checked="" type="checkbox"/>
ERSH, J.M.	<input checked="" type="checkbox"/>
REY, W.A.	<input checked="" type="checkbox"/>
AESTIC, J.R.	<input checked="" type="checkbox"/>
ELLEN, J.B.	<input checked="" type="checkbox"/>
ORGAN, R.V.	<input checked="" type="checkbox"/>
ARNELL, H.F.	<input checked="" type="checkbox"/>
OTTER, G.L.	<input checked="" type="checkbox"/>
HOADES, J.L.	<input checked="" type="checkbox"/>
FFELL, B.F.	<input checked="" type="checkbox"/>
INFORD, T.H.	<input checked="" type="checkbox"/>
HANNON, W.M.	<input checked="" type="checkbox"/>
AN LEUVEN, D.B.	<input checked="" type="checkbox"/>
ARNER, B.P.	<input checked="" type="checkbox"/>
UNG, E.R.	<input checked="" type="checkbox"/>
AKER, F.B.	<input checked="" type="checkbox"/>
ETCHER, D.H.	<input checked="" type="checkbox"/>
ARNIVAL, G.J.	<input checked="" type="checkbox"/>
ERRIER, D.R.	<input checked="" type="checkbox"/>
ELLISON, W.R.	<input checked="" type="checkbox"/>
ALGEISEN, L.P.	<input checked="" type="checkbox"/>
ARMAN, L.K.	<input checked="" type="checkbox"/>
OFFMAN, R.B.	<input checked="" type="checkbox"/>
AMMAN, R.L.	<input checked="" type="checkbox"/>
REIS, D.M.	<input checked="" type="checkbox"/>
UDENBERG, G.E.	<input checked="" type="checkbox"/>
AMON, E.R.	<input checked="" type="checkbox"/>
CHARDILLA, R.E.	<input checked="" type="checkbox"/>
ARNER, H.L.	<input checked="" type="checkbox"/>
ELASQUEZ, R.N.	<input checked="" type="checkbox"/>
ILSON, J.M.	<input checked="" type="checkbox"/>
Trump	<input checked="" type="checkbox"/>

SEP 24 1990

OSB:DEE:8644

Occupational Safety and Health Administration (OSHA) Required Training for Access to Hazardous Substance Areas

B.P. Warner
General Manager
EG&G Rocky Flats, Inc.

On March 6, 1989 OSHA published the Final Rule on "Hazardous Waste Operations and Emergency Response", (29CFR19190.120). This rule became effective on March 6, 1990 and sets forth the training requirements for personnel with access to and who work within hazardous waste areas. By direction from DOE-HQ, this training is required for all DOE and DOE-contractor employees requiring access to hazardous waste areas. Attachment 1 is a copy of the DOE-HQ, EH-321 memorandum, dated January 8, 1990.

The Rocky Flats Plant has numerous Treatment, Storage, or Disposal (TSD) facilities and other hazardous waste sites that fall under this standard. The minimum training required for personnel needing access to any of these areas is 24 hours. The more stringent 40-hour training is required at higher risk TSD operations involving closure, clean-up, and corrective actions or for sites involving CERCLA operations.

Subsequent to an inquiry by the EG&G Health & Safety Director, the Safety Division forwarded a memorandum to DOE-HQ for clarification regarding OSHA training required for escorted visitors to TSD facilities and other hazardous waste sites. It is DOE-HQ's position that everyone entering a waste site must have the requisite training unless they are able to demonstrate that by prior experience and training that they have had the equivalent of the initial training. This experience and training should be documented. Attachment 2 is a copy of DOE-HQ's response.

The current EG&G position of escorting non-trained personnel by a certified 40-hour OSHA-trained person onto a hazardous waste area does not satisfy the 29CFR1910.120 requirement, and would be a violation of OSHA regulations. This position is documented in an EG&G interoffice correspondence, from Carl E. Trump, dated August 16, 1990 on the subject of OSHA requirements for Building 664 (Attachment 3).

CORRESP. CONTROL ☒ ☒
COMMENTS MONT ☒
BWM TRACKING ☒Reviewed for Addressee
Corres. Control RFP9-25-90
DATE BY JB

Ref Ltr. #

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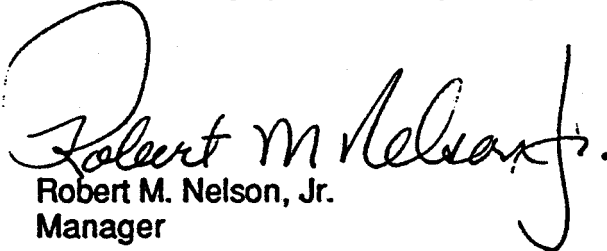
ADMIN RECORD

A-SW-001703

B. P. Warner

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Your immediate attention to this issue is expected. Please contact David Elskamp of my staff, at extension 7165, if there are any questions regarding this issue.



Robert M. Nelson, Jr.
Manager

2 Attachments

cc w/att:

S. Olinger, DOE
D. Ruscitto, DOE
T. Lukow, DOE
J. Krupar, DOE
J. Majestic, EG&G
R. Morgan, EG&G
C. Trump, EG&G

cc wo/att:

V. Witherill, DOE
M. Karol, DOE
D. Sargent, DOE
J. Kersh, EG&G
F. Allhoff, EG&G
G. Potter, EG&G